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U.S. Department of Transportation Dockets
Docket No. [FAA-99-5926] - *AK*
400 Seventh Street, SW.
Washington DC, 20590

Dear FAA:

Please add my comments to the record of the public hearing held on August 17, 1999, at Flagstaff, AZ. regarding the Overflights issue at the Grand Canyon. I was unable to attend the hearing but I am very concerned about the airspace issue and the noise problem at the Grand Canyon.

I am a private pilot and I own my own airplane. I live and work on the North Rim of the Grand Canyon. My airplane is based at Tuweep airstrip (L50) and I regularly fly over the Canyon and abide by the regulations of the SFAR 50-2. I am submitting comments based on being a US citizen, a resident of Arizona and a private individual, irrespective of my employment or flying actions.

The FAA should finalize and enforce operating rules for overflights to "substantially restore the natural quiet" at the Grand Canyon as mandated by the 1987 National Parks Overflights Act.

I believe there are simply too many commercial tour flights over the Grand Canyon, and that is the basis of this noise-impacts issue. Since the issue was addressed by Congress in 1987, the number of air tours has more than doubled over the Canyon, from about 50,000 to more than 100,000 per year. The public demands these flights, but, like many outdoor activities today, the carrying capacity of the resource is being exceeded and negative impacts are resulting. Tour overflights need not and should not be totally eliminated, as they are a legitimate way for many to experience the Grand Canyon. However, the FAA should cap the number of tour flights at the 1987 levels as a first step in restoring natural quiet. Let the people who demand these flights pay the prices (increased costs, more time and effort, reservations, etc.) that will result from a reduced supply.

As a second step, the FAA should adjust certain commercial tour routes and No Fly Zones to protect sensitive areas and those areas managed as wilderness or primitive areas. Two examples: (1) The Blue Direct and Brown 1 routes should be re-routed to completely avoid the Toroweap Overlook and Campground. I have observed and documented dozens of violations of the No Fly Zone in the Toroweap area, which is managed as a primitive area as per the General Management Plan for Grand Canyon NP. (2) Remote and spectacular places such as Point Sublime deserve relief from the nearly continuous barrage of both helicopters and fixed-wing aircraft flying across the Dragon Corridor.

Thirdly, the FAA should prohibit ALL tour and general aviation flights from flying below the level of the canyon rims. For example, people on the North Rim at Point Imperial should not have to hear and see the many aircraft flying on the Green 1 and Black 1 routes, while looking down into or even horizontally across the Canyon. A 1,000 feet AGL minimum (within 3 miles horizontally) would be a suitable compromise for sightseeing aircraft and their passengers to view the Canyon. I sometimes take family and friends on overflights of the Canyon in my personal plane. However, I must fly at much higher altitudes (9,000' MSL and 10,000' MSL depending on the sector) than the tour operators. One can easily get an overall perspective on the enormous size and grandeur of the canyon at the higher altitudes. If one wants up close and personal for photographs or video then they should get that by hiking, floating or riding into the Canyon.

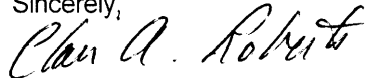
The air tour lobby is very powerful and it has been successful in delaying implementation of regulations that would restore natural quiet to the Grand Canyon, despite the law. The few individual voices of protest should not go unheeded. Whatever the outcome of these discussions, the FAA should better

monitor and enforce the restrictions on airspace over the Grand Canyon and punish those who violate them. Minimal fines are not a deterrent for the tour operators who may occasionally get caught. Revocation of licenses and operating permits is necessary.

In closing, I thank you for the opportunity to comment on the Overflights issue at the Grand Canyon. To summarize, I support efforts to "substantially restore natural quiet" to the Canyon through:

- a reduction and cap on commercial tour/scenic flights to the 1987 levels
- re-routing tour routes to avoid sensitive and remote areas of the park that are managed for solitude
- prohibiting flights below 1,000 feet AGL within 3 miles horizontally, anywhere in the Canyon
- increased monitoring, enforcement and sanctions/penalties for violators

Sincerely,

A handwritten signature in cursive script that reads "Clair A. Roberts". The signature is written in black ink and is positioned above the printed name.

Clair A. Roberts